

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE

I, Adam Ulery, do hereby depose and declare under penalty of perjury the following:

1. At all times relevant herein, I have been a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

2. During the months of November and December of 2012, agents researched information received from the ATF's National Tracing Center that indicated Raphael DENT may have conducted a straw purchase based on an ATF trace. Based on declarant's training and experience it is common place for individuals to purchase multiples of the same firearm during a straw purchase.

3. Declarant contacted the FOID Section of the Illinois State Police and identified nine separate firearm transactions that DENT had made at Ron & Jo's Firearms and Sporting Supplies located in O'Fallon, St. Clair County, Illinois, and at Pawn King of Fairmont Park located in Collinsville, Madison County, Illinois, between the time periods of May 31, 2008 and September 27, 2011.

4. Declarant conducted a criminal history check of DENT and discovered that DENT had arrests for crimes involving illegal drugs to include marihuana. DENT's last arrest for a drug related crime was on July 15, 2007.

5. On December 6, 2012, agents attempted to interview DENT at his residence in Cahokia, St. Clair County, Illinois regarding the alleged straw purchases of firearms. DENT was not at home and agents left a business card with DENT's girlfriend. Approximately two hours later DENT called declarant and advised that agents could respond to his residence to speak with him. Agents then traveled to DENT's residence and made contact with DENT in the front yard of his residence.

6. DENT was advised that he was not under arrest and that he did not have to speak with the agents. After speaking with DENT for a short time, agents asked DENT if he would be willing to give a videotaped statement. DENT agreed to make the statement. Declarant began recording DENT using declarant's I-phone.

7. DENT stated that no else had ever shot his firearms. DENT stated that he had approximately five other firearms. DENT admitted that he used marihuana twice a week from 2007 until approximately one year prior to this interview.

8. Declarant then presented DENT with an ATF Form 4473 that DENT had completed on May 31, 2008. DENT verified that he completed and signed said form. Declarant then asked DENT to read question "11e" on the form which reads "Are you a unlawful user of, or addicted to, marihuana, or any depressant, stimulant, or narcotic drug, or any other controlled substance?" DENT stated that he answered "No" for question "11e" when he completed any and all ATF Form 4473's. DENT stated he understood that there was an issue with the ATF Form 4473's that he completed. DENT also advised that he did not have a valid FOID card at the present time. Declarant asked DENT if he had all of the firearms he previously purchased. DENT stated he did not. DENT added that the firearms were located at his mother's residence. DENT acknowledged

that he did not think it was a “big deal” that he did not admit to being a user of marihuana on the ATF Form 4473’s.

9. DENT then advised that all of the firearms were not at his mother’s residence but were inside his residence. DENT sated that the reason he lied to agents was because he did not want to give up his firearms.

10. Declarant then presented DENT with the nine ATF Form 4473’s that DENT completed between the time period of May 31, 2008 and September 27, 2011. DENT verified that he completed each of the forms. DENT further verified that all of the firearms that were on the ATF Form 4473’s were inside of his residence. Declarant then stopped the audio/video recording.

11. Agents then entered DENT’s residence and seized the following firearms:

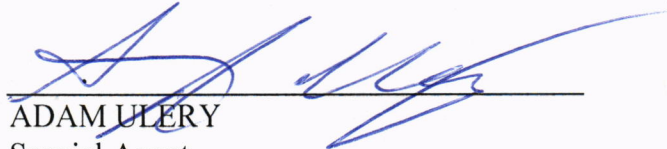
- a. One Izhmash (IMEZ) Saiga .223 caliber rifle, bearing serial number H06169046;
- b. One Beretta USA Corp., unknown model, .22 caliber pistol, bearing serial number PZ39386;
- c. One Smith & Wesson SW40VE .40 caliber pistol, bearing serial number DVJ8002;
- d. One Smith & Wesson SW40VE .40 caliber pistol, bearing serial number DVJ8019;
- e. One Smith & Wesson M&P 15-22p .22 caliber pistol, bearing serial number DUL4961;
- f. One Beretta USA Corp., unknown model, unknown caliber pistol, bearing serial number PZ12316;
- g. One Bond Arms Inc., Snake Slayer .45/.410 caliber Derringer, bearing serial number 61;
- h. One Kimber Ultra Crmsn Carry II .45 caliber pistol, bearing serial number KU117578;

- i. One Ruger LCP .380 caliber pistol, bearing serial number 372-48640;
- j. One Cobra Enterprises, Inc. Model CB38, .38 caliber Derringer, bearing serial number CT095; and
- k. One Taurus PT145 Millennium Pro .45 caliber pistol, bearing serial number NZJ27596.

12. Upon entering DENT's residence, agents smelled the odor of marihuana.

13. Based on the foregoing, affiant believes that the subject-matter property constitutes firearms involved in or used in a knowing violation of 18 U.S.C. § 922(g)(3) and are subject to forfeiture pursuant to 18 U.S.C. § 924(d).

Executed on this 25th day of April, 2013.



ADAM ULERY
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives